

## REMARKS

This is a full and timely response to the non-final Office Action dated September 26, 2006. Applicants note with appreciation the Examiner's thorough examination of the application as evidenced by the Office Action.

Prior to issuance of the present Office Action, Claims 1-30 were pending. In the present Amendment, Applicants amend Claims 1, 5-9, 11-13, 20-23 and 30, and cancel Claims 2-4 and 14-19. Claims 1, 5-13 and 20-30 therefore remain pending in the present application.

### Claim Rejections – 35 U.S.C. § 102

On Pages 2-4 of the Office Action, Claims 1-30 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Tsunenari* (U.S. Patent No. 7,076,449). As noted above, in the present Amendment, Applicants amend Claims 1, 5-9, 11-13, 20-23 and 30, and cancel Claims 2-4 and 14-19. To anticipate a claim, the cited reference must teach every element of the claim. *See* MPEP 2131; *Verdegaal Bros. v. Union Oil Co.*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as is contained in the . . . claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

#### *Independent Claim 1*

Applicant respectfully submits that amended Independent Claims 1 is not anticipated by *Tsunenari*. For example, *Tsunenari* does not teach or suggest the limitation of “receiving at said interface system a customer return request from one of said plurality of merchant computer systems, said customer return request including a merchant identifier.” *Tsunenari* also does not teach or suggest the limitation of “querying a database containing a plurality of returns rules to select one or more returns rules associated with said customer return request from the plurality of returns rules, the selection of said one or more returns rules being dependent on said merchant identifier.” These are significant distinctions because, as described on pages 28-36 of the present application, they allow for the provision of a single streamlined interfacing system to take customer return requests from a plurality of different merchant systems with different returns rules rather than having to provide a separate integrated system for each merchant. As noted on

pages 2-3 of the present application, integration of a merchant's internal systems with those of a carrier typically requires a great deal of programming and testing, which is often time-consuming and expensive.

Because *Tsunenari* does not teach or suggest each of the recited limitations, Applicants respectfully submit that independent Claim 1, as amended, is patentable over *Tsunenari*. Accordingly, Applicants respectfully request that the Examiner withdraw this rejection.

Claims 5-13 depend from independent Claim 1 and therefore include all of the limitations of amended Claim 1 plus additional limitations that further define the invention over the cited references. Accordingly, for this reason and for the reasons stated above, Applicants respectfully submit that Claims 5-13 are patentable over the prior art of record.

*Independent Claim 20*

Applicant respectfully submits that amended Independent Claims 20 is not anticipated by *Tsunenari*. For example, *Tsunenari* does not teach or suggest the limitation of "receiving at said interface system a customer return request from one of said plurality of merchant computer systems, said customer return request including a merchant identifier." *Tsunenari* also does not teach or suggest the limitation of "querying said database to select one or more returns rules associated with said customer return request from the plurality of returns rules, the selection of said one or more returns rules being dependent on said merchant identifier." Thus, Applicants respectfully request that the Examiner withdraw this rejection.

Claims 21-29 depend from independent Claim 20 and therefore include all of the limitations of amended Claim 20 plus additional limitations that further define the invention over the cited references. Accordingly, for this reason and for the reasons stated above, Applicants respectfully submit that Claims 21-29 are patentable over the prior art of record.

*Independent Claim 30*

Applicant respectfully submits that amended Independent Claims 30 is not anticipated by *Tsunenari*. For example, *Tsunenari* does not teach or suggest the limitation of "receiving, at said interface system, a customer return request sent by one of said plurality of merchant computer systems, said customer return request including a merchant identifier." Furthermore, *Tsunenari* does not teach or suggest the limitation of "querying said database with at least said merchant

identifier to select one or more returns rules associated with said customer return request from the plurality of returns rules, the selection being dependent on said merchant identifier.” Thus, Applicants respectfully request that the Examiner withdraw this rejection.

### **Conclusion**

The foregoing is submitted as a full and complete response to the non-final Office Action mailed September 26, 2006. The foregoing amendments to the claims, when taken in conjunction with the appended remarks, are believed to have placed the present application in condition for allowance, and such action is respectfully requested. The Examiner is encouraged to contact Applicant’s undersigned attorney at (404) 881-7452 to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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